

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JUAN PABLO JIMENEZ-ESCOBAR,	:	VIOLATIONS:
a/k/a “Juan Jimenez,”	:	21 U.S.C. § 841(a)(1) (distribution of
a/k/a “Juan Jimenez-Ocelotl”	:	heroin - 5 counts)
	:	21 U.S.C. § 841(a)(1) (distribution of
	:	100 grams or more of heroin - 1
	:	count)
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute heroin - 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 17, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

JUAN PABLO JIMENEZ-ESCOBAR,
 a/k/a “Juan Jimenez,”
 a/k/a “Juan Jimenez-Ocelotl,”

knowingly and intentionally distributed approximately 8.9 grams of a mixture and substance
containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 11, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**JUAN PABLO JIMENEZ-ESCOBAR,
a/k/a “Juan Jimenez,”
a/k/a “Juan Jimenez-Ocelotl,”**

knowingly and intentionally distributed approximately 19.7 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JUAN PABLO JIMENEZ-ESCOBAR,
a/k/a “Juan Jimenez,”
a/k/a “Juan Jimenez-Ocelotl,”**

knowingly and intentionally distributed approximately 23.0 grams of a mixture and substance
containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JUAN PABLO JIMENEZ-ESCOBAR,
a/k/a “Juan Jimenez,”
a/k/a “Juan Jimenez-Ocelotl,”**

knowingly and intentionally distributed approximately 47.4 grams of a mixture and substance
containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JUAN PABLO JIMENEZ-ESCOBAR,
a/k/a “Juan Jimenez,”
a/k/a “Juan Jimenez-Ocelotl,”**

knowingly and intentionally distributed approximately 101.4 grams of a mixture and substance
containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 20, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JUAN PABLO JIMENEZ-ESCOBAR,
a/k/a “Juan Jimenez,”
a/k/a “Juan Jimenez-Ocelotl,”**

knowingly and intentionally distributed approximately 48.5 grams of a mixture and substance
containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 10, 2007, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**JUAN PABLO JIMENEZ-ESCOBAR,
a/k/a “Juan Jimenez,”
a/k/a “Juan Jimenez-Ocelotl,”**

knowingly and intentionally possessed with intent to distribute approximately 9.6 grams of a
mixture and substance containing a detectable amount of heroin, a Schedule I controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendant

**JUAN PABLO JIMENEZ-ESCOBAR,
a/k/a “Juan Jimenez,”
a/k/a “Juan Jimenez-Ocelotl,”**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offenses; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY